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16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 TYSHEA DICKSON, an individual,

19 Case No.: 2:25-cv-00803-GMN-BNW

20 Plaintiff,

21 **STIPULATED DISCOVERY PLAN AND**
SCHEDULING ORDER

22 v.
 23 COMPASSION CREST, LLC, a Nevada
 24 limited liability company,

25 **SUBMITTED IN COMPLIANCE WITH**
LR 26-1(b)

26 Defendant.

27 Pursuant to Federal Rule of Civil Procedure 26(f) and LR 26-1, Plaintiff Tyshea Dickson
 28 (“Plaintiff”), by and through her counsel of record, GREENBERG GROSS LLP, and Defendant
 1 Compassion Crest, LLC (“Defendant”), by and through its counsel of record, KAMER ZUCKER
 2 ABBOTT, hereby stipulate to the following Joint Proposed Discovery Plan and Scheduling Order:

3 1. **Initial Disclosures:** The parties participated in the scheduling conference pursuant
 4 to Fed. R. Civ. P. 26(f) on **July 15, 2025**. The parties shall exchange initial disclosures pursuant to
 5 Fed. R. Civ. P. 26(a)(1) no later than fourteen (14) days after the Rule 26(f) conference, which will
 6 be **July 29, 2025**.

1 2. **Discovery Cut-Off Date(s):** The last day of discovery shall be **December 15, 2025**
 2 which is 181 days from the date Defendant filed the Answer to Plaintiff's Complaint on **June 17, 2025**
 3 (180 days from the date Defendant filed the Answer to Plaintiff's Complaint is Sunday, December
 4 14, 2025).

5 3. **Amending the Pleadings and Adding Parties:** The parties shall have until
 6 **September 16, 2025**, which is ninety (90) days before the discovery cut-off date.

7 4. **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** The disclosure of any initial expert
 8 witnesses shall be made by **October 16, 2025**, which is sixty (60) days before the discovery
 9 deadline. The disclosures of any rebuttal experts shall be made by **November 14, 2025**, which is
 10 thirty-one (31) days before the discovery deadline (30 days before the discovery deadline is
 11 Saturday, November 15, 2025).

12 5. **Dispositive Motions:** Dispositive motions may be filed no later than **January 14, 2026**,
 13 which is thirty (30) days after the discovery deadline. In the event that the discovery period
 14 is extended from the discovery cut-off date set forth in this Joint Discovery Plan and Scheduling
 15 Order, the date for filing dispositive motions shall be extended for the same duration, to be no later
 16 than thirty (30) days after the discovery cut-off date.

17 6. **Pretrial Order:** If no dispositive motions are filed, the Joint Pretrial Order shall be
 18 filed by **February 13, 2026**, which is thirty (30) days after the deadline for filing dispositive
 19 motions. In the event dispositive motions are filed, the date for filing the joint pretrial order shall
 20 be suspended until thirty (30) days after the decision of the dispositive motions or until further order
 21 of the Court.

22 7. **Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P.
 23 26(a)(3), and any objections thereto, shall be included in the pretrial order. Extensions or
 24 Modifications of the Discovery Plan and Scheduling Order: In accordance with Local Rule 26-4, a
 25 stipulation or motion for modification or extension of this discovery plan and scheduling order and
 26 any deadline contained herein, must be made not later than twenty-one (21) days before the subject
 27 deadline.

28

1 8. **Electronic Filing and Service:** The Parties attorneys of record in this matter are
 2 registered users with the Court's electronic filing system and as such, consent to electronic service
 3 of all documents and things electronically filed with the Court, except for pleadings and other
 4 documents set forth in Fed. R. Civ. P. 4. For documents and things that are not filed with the Court,
 5 the parties, in accordance with Fed. R. Civ. P. 5(b)(2)(F), each consent to electronic service of the
 6 same as follows: for Plaintiff, service shall be made by email to MHale@ggtriallaw.com;
 7 MMassey@ggtriallaw.com, MHurtado@ggtriallaw.com, and PNajeragarcia@ggtriallaw.com, and
 8 for Defendants, service shall be made by email to ecf@kzalaw.com, kknight@kzalaw.com,
 9 tcreer@kzalaw.com, and schao@kzalaw.com.

10 9. **Electronically Stored Information:** The parties do not at this time anticipate any
 11 issues regarding disclosures, discovery or preservation of electronically stored information ("ESI"),
 12 if any, including the form or forms in which it should be produced. The parties anticipate that
 13 evidence will be presented to jurors at trial in electronic format. As such, the parties will endeavor
 14 to produce all documents in a format compatible with the Court's electronic jury evidence display
 15 system. The parties agree that ESI can be produced or presented at trial in a readable image (e.g.,
 16 .pdf or .tiff) file, while reserving the right to thereafter seek production of the ESI in native format
 17 if necessary and to the extent readable images are insufficient in establishing any claims or defenses.
 18 If a party later requests the ESI be produced in its native format and/or as a forensic copy, the parties
 19 agree to meet and confer to determine the parameters of the production and to produce according
 20 to the Federal Rules of Civil Procedure. The parties shall work in good faith with respect to the
 21 production and presentation of ESI at trial.

22 10. **Privileged or Protected Documents:** The parties agree to be bound by Fed. R.
 23 Evid. 502 regarding the disclosure of privileged material or work product. Further, the parties
 24 acknowledge and agree that while each is taking reasonable steps to identify and prevent disclosure
 25 of any document which they believe is privileged, there is a possibility that certain privileged
 26 material may be produced inadvertently. Accordingly, the Parties agree that a party who produces
 27 a document protected from disclosure by the attorney-client privilege, attorney work product
 28 doctrine or any other recognized privilege ("privileged document") without intending to waive the

1 claim of privilege associated with such document may promptly notify the requesting party that
 2 such document was inadvertently produced and should have been withheld. Once the producing
 3 party provides such notice to the requesting party, the requesting party must promptly return the
 4 specified document(s) and any copies thereof. By complying with this obligation, the requesting
 5 party does not waive any right to challenge the assertion of privilege.

6 11. **Alternative Dispute Resolution:** In compliance with Local Rule 26-1(b)(7), the
 7 parties certify that they met and conferred about the possibility of using alternative dispute
 8 resolution processes, but no agreement has been reached. The parties will continue to evaluate
 9 opportunities for alternative dispute resolution.

10 12. **Alternative Forms of Case Disposition:** In compliance with 28 U.S.C. § 636(c)
 11 and Local Rule 26-1(b)(8), the parties have considered consenting to the assigned Magistrate Judge
 12 as well as the Short Trial Program, but do not consent to trial by the magistrate judge or to the use
 13 of the Short Trial Program at this time.

14 Dated this July 21, 2025.

15 */s/ Marian L. Massey*
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15 */s/ R. Todd Creer*
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 22 *Attorneys for Defendant*

23 **ORDER**

24 IT IS SO ORDERED:

25 

26 UNITED STATES MAGISTRATE JUDGE

27 DATED: 7/22/2025